

U.S. Department of Justice

United States Attorney Eastern District of New York

F. #2016R02185

271 Cadman Plaza East Brooklyn, New York 11201

February 10, 2020

By Hand and ECF

The Honorable Kiyo A. Matsumoto United States District Judge United States District Court Eastern District of New York Brooklyn, NY 11201

Re: United States v. Donville Inniss

Criminal Docket No. 18-134 (S-2)(KAM)

Dear Judge Matsumoto:

The government respectfully submits this letter, with the consent of defense counsel, regarding the Court's order directing the parties to submit a joint letter today advising the Court on how the parties wish to proceed with the forfeiture component of the defendant Donville Inniss' conviction after trial.

The parties are attempting to come to an agreement on a forfeiture money judgment. If an agreement cannot be reached by March 19, 2020, the date that the defendant's reply brief for his R. 29 motion is due, the parties propose the following briefing schedule for the forfeiture motion:

April 3, 2020: the government's forfeiture opening brief.

April 17, 2020: the defendant's response.

April 24, 2020: the government's reply (if any).

The parties respectfully request that the Court so order the parties' proposed schedule.

Respectfully submitted,

RICHARD P. DONOGHUE United States Attorney

By: /s/

Sylvia Shweder
David Gopstein
Assistant U.S. Attorneys
(718) 254-6092/6153

ROBERT A. ZINK Chief, Fraud Section Criminal Division U.S. Department of Justice

By: /s/

Gerald M. Moody, Jr.
Trial Attorney
U.S. Department of Justice
(202) 616-4988

cc: Anthony Ricco, Esq., and Steven Legon, Esq. (by ECF)